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Attorney for Defendant
ROWLAND MARCUS ANDRADE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No. 3:20-cr-00249-RS

**STIPULATION AND [PROPOSED]
ORDER REGARDING DEFENDANT
ROWLAND MARCUS ANDRADE'S
MOTION TO COMPEL DISCOVERY**

The government and Defendant Rowland Marcus Andrade hereby stipulate and agree as follows:

- Following a meet-and-confer, defendant filed a Motion to Compel on July 15, 2022, seeking materials that had been seized from defendant more than two years ago and were later assigned to a government taint team for review.
- On July 18, 2022, the government made a production of materials (Bates numbered 000001 – 031047), and has explained that, rather than waiting for the taint team to complete its review, it asked the taint team to make available for production only to defense counsel all the materials being reviewed, as the defendant's motion to compel had suggested.

1 3. Both the government and the defendant are still verifying that the July 18 production is
2 as it has been described and includes all material assigned for review to the taint team. In
3 addition, the parties are still verifying that, with the July 18 production and a production by
4 the government on July 11, 2022, the defendant now has all the material seized from the
5 defendant or his businesses pursuant to search warrants.

6 4. The parties ask the court to permit defendant to withdraw his July 15, 2022 motion to
7 compel without prejudice, pending any issues identified in the verification process described
8 above that cannot be resolved.

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10 IT IS SO STIPULATED.

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12 Dated: July 22, 2022

By: /s/ Michael J. Shepard
MICHAEL J. SHEPARD
Attorney for Defendant
Rowland Marcus Andrade

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14
15 Dated: July 22, 2022

By: /s/ Ross Weingarten
ROSS WEINGARTEN, AUSA
Attorney for Plaintiff
United States of America